

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

R. DAVID WOLFE,)	
)	
Plaintiff,)	Case No. 1:13-cv-00859-SL
)	
v.)	
)	
WEISS, et al.,)	JUDGE SARA LIOI
)	
Defendants.)	

DECLARATION OF BRETT W. BELL

BRETT W. BELL declares under penalty of perjury, pursuant to 28 U.S.C. § 1746, as follows:

1. I am an associate in the law firm of Jones Day. I am a member in good standing of the Bar of the State of Ohio, and I am licensed to practice before this Court. I represent defendants Elie Weiss, Gary Weiss, Jeffrey Weiss, Judith Weiss, Morry Weiss, Zev Weiss, the Irving I. Stone Limited Liability Company, the Irving I. Stone Oversight Trust, and the Irving I. Stone Foundation (the “Weiss Defendants”) in this action.

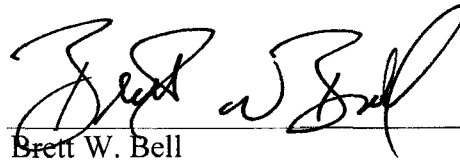
2. I make this declaration to authenticate copies of materials to be considered in connection with the Weiss Defendants’ Motion to Dismiss or to Stay. Submitted herewith are copies of the following:

- Exhibit A: All unreported cases cited in the Weiss Defendants’ Memorandum of Law in Support of Motion to Dismiss or to Stay;
- Exhibit B: American Greetings Corporation Form PRER 14-A Preliminary Proxy Statement, filed with the Securities and Exchange Commission on July 5, 2013;
- Exhibit C: Docket sheet, *In re American Greetings Corp. Shareholder Litigation*, No. CV 12-792421 (Cuyahoga Cnty. Ct. C.P.); and

Exhibit D: *In re American Greetings Corp. Shareholder Litigation*, No. CV 12-792421, Consolidated Class Action Complaint (Cuyahoga Cnty. Ct. C.P. Apr. 30, 2013).

I declare under penalty of perjury that the foregoing is true and correct, based upon my knowledge, information, and belief.

Dated: July 8, 2013



Brett W. Bell